

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

Sensa Verogna,

Plaintiff,

v.

Twitter, Inc.,

Defendant.

Civil Case No. 1:20-cv-00536-SM

**TWITTER’S MOTION TO DISMISS COMPLAINT**  
**OR, ALTERNATIVELY, TRANSFER**

NOW COMES the Defendant, Twitter, Inc. (“Twitter”), by and through its counsel, Orr & Reno, Professional Association, and pursuant to Federal Rule of Civil Procedure 12(b)(6), moves to dismiss the complaint in its entirety or, in the alternative, and pursuant to 28 U.S.C. § 1404(a), that the Court transfer the case to the United States District Court for the Northern District of California. In support hereto, Twitter states as follows:

1. Twitter’s argument in support of its Motion to Dismiss Complaint or, Alternatively, Transfer is set forth in its accompanying memorandum of law filed herewith.
2. In support of Twitter’s Motion is the Declaration of Jonathan Eck, Esquire, which is submitted herewith.



WHEREFORE, the Defendant, Twitter, Inc., respectfully requests that this Honorable Court:

- A. Grant Twitter's Motion to Dismiss Complaint and dismiss, with prejudice, Plaintiff's claims and this action;
- B. In the alternative, transfer any surviving claims against Twitter to the Northern District of California; and
- C. Grant such other and further relief as may be just and equitable.

Respectfully submitted,

**Twitter, Inc.**

By its attorneys,

ORR & RENO, PROFESSIONAL ASSOCIATION

Dated: June 1, 2020

By: /s/ Jonathan M. Eck  
Jonathan M. Eck, Esq. (NH Bar #17684)  
45 S. Main Street, P.O. Box 3550  
Concord, NH 03302  
(603) 223-9100  
jeck@orr-reno.com

Julie E. Schwartz, Esq. (*motion for pro hac vice admission to be filed*)  
Perkins Coie LLP  
3150 Porter Drive  
Palo Alto, CA 94304-1212  
(650) 838-4490  
JSchwartz@perkinscoie.com

**CERTIFICATE OF SERVICE**

I, Jonathan M. Eck, certify that on this date service of the foregoing document was made upon the Plaintiff, *pro se*, via email.

Dated: June 1, 2020

/s/ Jonathan M. Eck  
Jonathan M. Eck, Esq. (NH Bar #17684)